

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

SHEREE WATERHOUSE,

Plaintiff,

V.

Case Number: 4:17-CV00843 AGF

CITY OF MANCHESTER/  
MANCHESTER POLICE DEPARTMENT,

## JURY TRIAL DEMANDED

and

TIMOTHY WALSH,

and

ANDY HIXSON,

Defendants.

## JOINT PROPOSED SCHEDULING PLAN

The parties, Plaintiff Sheree Waterhouse, (“Plaintiff”) and Defendants City of Manchester, Manchester Police Department, Timothy Walsh, and Andy Hixson, (“Defendants”), by and through counsel of record, and pursuant to F.R.C.P. 26(f), submit the following Joint Proposed Scheduling Order:

1. The parties agree that a Standard Track 2 assignment is appropriate in this matter.
2. Plaintiff should be allowed until June 9, 2017, to join additional parties to amend the pleadings. Defendant should be allowed until July 7, 2017, to join additional parties to amend the pleadings.
3. Discovery Plan: The parties jointly proposed the following discovery plan to the Court:
  - (a) The parties agree to exchange the information required by Fed. R. Civ. P.

26(a)(1) by June 9, 2017.

(b) It is not necessary to conduct discovery in phases or to limit discovery other than as limited in the Federal Rules and cases interpreting the same.

(c) A maximum of 30 requests for admission by each party to any other party. Responses due 30 days after service unless otherwise agreed to pursuant to Fed. R. Civ. P. 29.

(d) The presumptive limits of 25 interrogatories and 10 depositions should not apply in this case. There are several individuals who may need to be deposed given the time span involved.

(e) Any requests for physical or mental examination of Plaintiff pursuant to Rule 35 shall be made no later than October 27, 2017, and all examinations shall be conducted no later than November 6, 2017.

(f) All discovery will commence in time to be completed on or before December 11, 2017. In reaching this proposed date for the completion of discovery, counsel has considered the theory or recovery pled by Plaintiff, the related affirmative defenses, and the complexity of the legal issues.

(g) Plaintiff will designate expert witnesses by December 15, 2017, and produce accompanying reports by January 8, 2017. Defendant will designate expert witnesses by January 12, 2017, and produce accompanying reports by February 5, 2017.

(h) The parties do not anticipate any unusual discovery issues in this case.

4. Any dispositive motions will be filed on or before, February 28, 2018.

5. This case should be ready for trial by September 10, 2018, will be tried by jury, and given the anticipated number of witnesses to be called, should take approximately 4-5 days to try.

Settlement potential cannot be fully evaluated prior to the commencement of discovery, but negotiations will be ongoing. The case shall be referred to Alternative Dispute Resolution on July 21, 2017, and that reference shall terminate on September 18, 2017.

Respectfully Submitted,

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